

UNITED STATES DISTRICT COURT FOR THE  
MIDDLE DISTRICT OF PENNSYLVANIA

---

Public Interest Legal Foundation,

*Plaintiff,*

*v.*

Kathy Boockvar, Secretary of the  
Commonwealth of Pennsylvania, in her  
official capacity.

*Defendant.*

Civ. No. 20-\_\_\_\_\_

**ORAL ARGUMENT  
REQUESTED**

**MOTION FOR A PRELIMINARY INJUNCTION**

Plaintiff Public Interest Legal Foundation respectfully requests that this Court grant it a preliminary injunction preventing Defendant Kathy Boockvar, the Secretary of the Commonwealth of Pennsylvania, from including the names of 21,206 apparently deceased (and hence, ineligible) registrants on the list of eligible voters and corresponding poll books for the upcoming November 3, 2020 general election. Defendant's failure to remove these individuals from the list of eligible voters violates the National Voter Registration Act of 1993. In counties where paper poll books are used, poll books may be printed as soon as

October 20, the day after registration ends. In support of this Motion, Plaintiff concurrently files a Memorandum in Support herewith.

Respectfully submitted,

For the Plaintiff:

/s/ Linda A. Kerns

Law Offices of Linda A. Kerns, L.L.C.  
1420 Locust St., Ste. 200  
Philadelphia, PA 19102  
Tel: (215) 731-1400  
Fax: (215) 701-4154  
linda@lindakernslaw.com

Sue Becker (MO 64721)\*  
PUBLIC INTEREST LEGAL FOUNDATION  
32 E. Washington Street, Suite 1675  
Indianapolis, IN 46204  
Tel: (317) 203-5599  
Fax: (888) 815-5641  
[sbecker@publicinterestlegal.org](mailto:sbecker@publicinterestlegal.org)

John Eastman (CA 193726)\*  
Center for Constitutional  
Jurisprudence  
c/o Chapman Univ. Fowler Sch. of Law  
One University Dr.  
Orange, CA 92866  
Tel: (877) 855-3330  
Fax: (316) 264-1518  
[jeastman@chapman.edu](mailto:jeastman@chapman.edu)

Bradley J. Schlozman (KS 17621)\*  
HINKLE LAW FIRM  
1617 N. Waterfront Parkway, Ste. 400  
Wichita, KS 67206-6639  
Tel: (316) 267-2000  
Fax: (316) 264-1518  
[bschlozman@hinklaw.com](mailto:bschlozman@hinklaw.com)

*\*Applications for Admission  
Forthcoming*

## **CERTIFICATE OF SERVICE**

I certify that on October 15, 2020, I filed the foregoing with the Clerk of the Court using the CM/ECF system, and a copy was made available to all electronic filing participants.

*/s/ Linda A. Kerns*  
Linda A. Kerns